

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA

DAWNA MALLOW,

Plaintiff,

v.

ETHICON, INC. and
JOHNSON & JOHNSON,

Defendants.

CASE NO. 5:20-cv-01172-PRW

AMENDED VERIFIED MOTION TO WITHDRAW AS ATTORNEY OF RECORD

COMES NOW, Andrea R. Rust, Laura J. Baughman, and Rachel L Wright, the attorneys of record for Plaintiff in the above styled and numbered cause and moves the Court to allow to withdraw as the Plaintiff's attorneys of record.

1. There is good cause for this court to grant the motion to withdraw. Specifically, an irretrievable breakdown in communication between attorneys and client have resulted in a fundamental disagreement as to the prosecution of this matter, whereby the attorney-client relationship has ceased to exist.
2. In the event this Motion is granted, Plaintiff will be proceeding without counsel in this case. Previous counsel, Mr. Robert Talaska, passed away in March 2019, and Mr. Raymond Panneton is no longer the assigned attorney on the case.
3. On October 27, 2021 (Doc. 113), counsel for Plaintiff and Defendants filed a Joint Motion for Extension of Case Deadlines. This Joint Motion was granted by the Court on October 28, 2021 (Doc. 115). This extension of deadlines will allow

Plaintiff additional time to find new counsel so as to be prejudiced by this withdrawal.

4. Plaintiff is aware of this Motion to Withdraw. Plaintiff's full name and current mailing address are as follows:

Ms. Dawna Mallow
701 SW 27th St
Moore, OK 73160-5522

5. Defendants are unopposed to this withdrawal.

WHEREFORE, the undersigned counsel prays that they be allowed to withdraw as attorney of record for the Plaintiff in this case.

Dated: October 28, 2021

Respectfully submitted,

/s/ Rachel L. Wright

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ATTORNEYS FOR PLAINTIFF

VERIFICATION

I, Rachel L. Wright, being duly sworn, on oath, verify that I have read the foregoing Amended Motion to Withdraw as Attorney of Record and it is true and correct to the best of my knowledge and belief.



RACHEL L. WRIGHT